

Via ECF

The Honorable Arun Subramanian
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St., Courtroom 15A
New York, NY 10007

February 19, 2025

Re: *United States, et al. v. Live Nation Entertainment, Inc., et al.*, No. 1:24-cv-3973-AS

Dear Judge Subramanian:

Plaintiffs intend to oppose the motion to intervene and to amend the protective order filed on February 18 by non-parties Skot Heckman, Luis Ponce, Jeanene Popp and Jacob Roberts (“Heckman Plaintiffs”). ECF 424.

The Heckman Plaintiffs filed their motion as a letter brief, which suggests that it is a discovery motion subject to the shortened briefing schedule set forth in Rule 5 of Your Honor’s Individual Practices in Civil Cases (requiring that any opposition to a discovery motion be filed within two business days). Their motion is not, however, a discovery motion filed pursuant to Federal Rules of Civil Procedure 26 through 37; nor are the Heckman Plaintiffs “parties.” To allow Plaintiffs and the many non-party producing entities sufficient time to respond to the motion, Plaintiffs request that this Court confirm that oppositions are not due tomorrow, February 20. Recognizing the importance of resolving this issue expeditiously, however, Plaintiffs are amenable to a shorter briefing period than the 14 days provided under Local Rule 6.1(b).

For these reasons, Plaintiffs respectfully request that this Court set a deadline for any oppositions to the Heckman Plaintiffs’ Motion to Intervene and to Amend the Protective Order for February 28, 2024.

Respectfully submitted,

GRANTED. SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: February 20, 2025

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